



# Seattle City Attorney

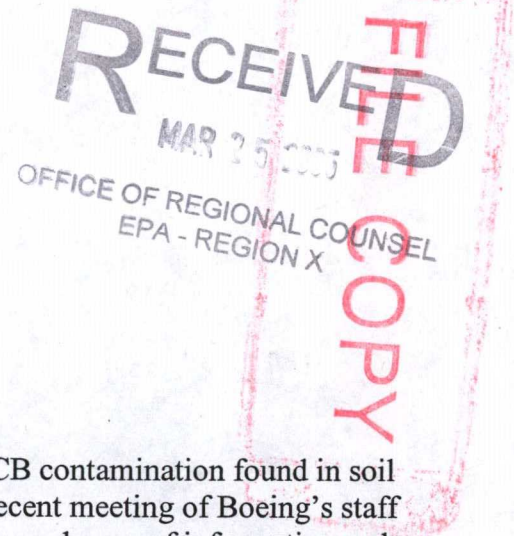
Thomas A. Carr

WA 6819  
3/22/05  
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Laura Wishik  
Assistant City Attorney  
(206) 684-8199

March 22, 2005

Paul R. Carlson, Esq.  
The Boeing Company  
M/C 7A-XP  
PO Box 3707  
Seattle, WA  
98124-2207



Re: Boeing West Substation

Dear Paul:

I am writing to clarify how Seattle City Light views the PCB contamination found in soil near the Boeing West Substation at Plant 2. We appreciated the recent meeting of Boeing's staff and consultant with Seattle City Light's staff and consultants. The exchange of information and views was productive and frank.

When Boeing first discovered the soil contamination near the substation, it was natural to suspect that the substation equipment might be the source. It is now apparent, however, based on the information and data that has been collected by both parties over the past three years since the initial discovery, that the PCBs did not come from SCL's equipment or operations. From SCL's perspective, the key facts are:

- The level of PCB contamination discovered in the soil was as high as 660 ppm. All of the transformers that have been used at the substation have been tested. The highest concentration of PCBs found in transformer oil or equipment was 6 ppm, one hundred times less than the concentration in the soil. It is impossible for the hotspot to have come from SCL's transformers.
- According to maintenance records for the substation, only small amounts of oil were ever added to the transformers. Unlike some industries, Seattle City Light did not have a practice of running transformer oil through an on site filter or draining and refilling transformers in situ.
- The substation location was used for material storage prior to construction of the substation pad. Aerial photos show many barrels stored in that area.

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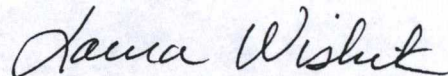
Paul Carlson, Esq.  
March 21, 2005  
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- Boeing had its own transformers in various locations at Plant 2. These transformers contained high levels of PCBs.

Given these facts, Seattle City Light considers it likely that PCB contaminated oil from Boeing's own equipment or material storage was the source of the hotspot, or perhaps the contamination originated on the Jorgensen site. Seattle City Light continues to be interested in any data or information that would help to identify the source of the contamination. Laurie Geissinger will be providing Will Ernst with the reference number for the map of Boeing storm drains showing a line passing diagonally under the substation pad. We look forward to hearing the results of Boeing's ongoing data collection and storm drain videotaping efforts.

In light of the facts that are now known, statements attributing the soil contamination to Seattle City Light's equipment or operations are unfounded and potentially defamatory. We ask Boeing to cease making such statements orally or in documents submitted to EPA or made available to the public.

Very Truly Yours,



Laura B. Wishik, Director  
Environmental Protection Section

ltr to boeing re west sub.doc

CC:

Jorge Carrasco, Superintendent, Seattle City Light  
John Prescott, SCL Deputy Superintendent for Power Management  
Tim Ceis, Deputy Mayor  
Lynn Best, Director, SCL Environment & Safety  
Laurie Geissinger, SCL Environmental Management & Compliance  
Martin Baker, Corporate Policy & Performance, Seattle Public Utilities  
Charles Ordine, EPA Regional Counsel's Office